

EXHIBIT C

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February 25, 2022

VIA EMAIL

Clem C. Trischler, Esquire
Pietragallo Gordon Alfano Bosick & Raspanti, LLP
One Oxford Centre, 38th Floor
Pittsburgh, Pennsylvania 15219

**RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation,*
No. 1:19-md-02875**

Dear Counsel:

I am writing in response to your February 16, 2022 letter. Due to the focus on the Daubert hearings and our need to review your letter and compare your assertions to the transcript of the deposition of Dr. Najafi, we are only now responding.

The premise of your requests is set forth in the first paragraph of your letter. That paragraph begins with assertions as to testimony purportedly provided by Dr. Najafi. Please advise as to where in the transcript Dr. Najafi testified that any testing his laboratory performed was on drug product “obtained from named Plaintiffs.” We do not see such testimony. Also, please advise as to where in the transcript Dr. Najafi testified that his laboratory performed confirmatory testing for Valisure’s citizen petition of June 13, 2019, which showed the presence of NDMA in Novartis’s RLD. We do not see any such testimony either – in fact, Dr. Najafi testified that Emery is not named in the Valisure petition, which means Emery did not confirm the findings listed in

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the petition by Valisure. Moreover, the Valisure petition refers to Novartis valsartan and valsartan HCTZ which is **not** the RLD (Diovan). Finally, Dr. Najafi testified that his lab has not tested Diovan or Exforge.

Based on the assertions in the first paragraph of the letter, which do not appear to be factually accurate, and appear to be at odds with the actual testimony, you make certain requests in an effort to demonstrate that testing by Dr. Najafi's lab of Novartis Diovan showed the presence of NDMA. As stated, there is no testimony in the transcript that this occurred, and the testimony is not consistent with your assertion. Moreover, as established in the transcript, Health Canada tested Novartis Diovan and found it to contain **no** NDMA or NDEA.

You then advance 6 requests for production that do not appear to be supported by the record, as set forth above. We believe that the prudent course is to engage in a meet and confer where you can explain the basis for the assertions underlying your requests, which we can then consider.

Please advise.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Adam M. Slater', written over a horizontal line.

ADAM M. SLATER

Cc: Defense Executive Committee (via email)